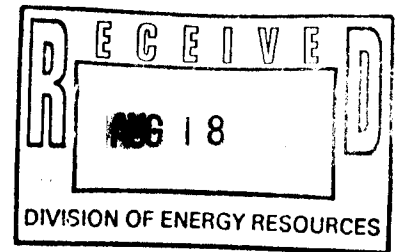


Pamela F. Faggert
Vice President and Chief Environmental Officer
5000 Dominion Boulevard, Glen Allen, VA 23060
Phone: 804-273-3467



August 18, 2005

Mr. Howard Bernstein
RPS Program Manager
Massachusetts Division of Energy Resources
100 Cambridge Street
Suite 1020
Boston, MA 02114



**RE : Commonwealth Of Massachusetts, Office of Consumer Affairs and Business
Regulation, Division of Energy Resources, Renewable Energy Portfolio Standard
Notice of Inquiry, Dated July 1, 2005**

Dear Mr. Bernstein:

As a stakeholder, Dominion appreciates the opportunity to submit further comments concerning the Renewable Energy Portfolio Standard Notice of Inquiry, dated July 1, 2005 issued jointly by the Division of Energy Resources (DOER) and the Department of Environmental Protection (DEP). These comments augment our original comments dated July 20, 2005.

Dominion respectfully suggests that DOER and DEP embrace the common sense approach for producing multiple public benefits mentioned by many at the July 28th stakeholder meeting. That is, the co-firing of biomass in the electric generating units subject to 310 CMR 7.29 is consistent with the original DOER stated RPS public policy goals in the deliberative process including:


- Decreased emissions from existing power plants,
- Diversity of the fuels used to generate electrical power,
- Decreased reliance on fuels imported from other regions, and
- Moderation of price volatility caused by reliance on imported fuels.

Also mentioned at the stakeholder meeting were the co-benefits these facilities could provide, if allowed to co-fire biomass and be eligible to generate renewable energy certificates (REC's), to help address the state's serious lack of landfill space, provide emissions reductions and help contribute to the goals of greenhouse gas reductions statewide.

In order to address REC market supply issues, one alternative DOER and DEP may want to consider is restricting the percentage of annual co-firing output which would be REC eligible from these units. This would serve to mitigate REC market concerns while allowing the existing electric generating units subject to 310 CMR 7.29 to retool and qualify for RECs.

Thank you again for this opportunity to express our views and please feel free to call me at 804-273-3467 or Paula Hamel at 401-457-9234, if you have any questions.

Respectfully,

A handwritten signature in cursive script that reads "Paula A. Hamel, for". The signature is written in dark ink and is positioned above the printed name.

Pamela F. Faggert

cc:

P. Hamel – Dominion

D. Weekley -Dominion